

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NEW YORK**

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In re:  
The Diocese of Rochester,  
Debtor.

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Case No. 2-19-20905-PRW  
Chapter 11

The Diocese of Rochester,  
Plaintiff

Adversary Proceeding  
No.: 19-ap-0202

v.

The Continental Insurance Company, Certain  
Underwriters at Lloyd's, London, Certain  
London Market Companies, The Dominion  
Insurance Company Limited, Stronghold  
Insurance Company Limited, CX Reinsurance  
Company Limited, Markel International  
Insurance Company Limited, Tenecom Limited,  
National Surety Corporation, Interstate Fire &  
Casualty Company, Colonial Penn Insurance  
Company, and HDI Global Specialty SE,

Defendants.

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**UNDERWRITERS'<sup>1</sup> JOINDER TO THE DEBTOR'S SALE MOTION  
AND TO THE REPLIES TO OBJECTIONS TO SALE MOTION**

Underwriters, by and through their attorneys, hereby submit this Joinder to (i) the Debtor's Motion for Entry of Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Settlement Agreements and Policy Buy-Backs with Certain Insurers and Granting Related Relief [Main Case Docket No. 3072] (the "Sale Motion"), and (ii) the Replies to the Objections<sup>2</sup> of the UST and CNA filed by: the Debtor [Main Case Docket No. 3198] (the

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<sup>1</sup> The term "Underwriters" refers, collectively, to those Certain Underwriters at Lloyd's, London, HDI Global Specialty SE, and Convex Insurance UK Limited subscribing to Certificate Nos. 18W2012, 18XS133, 19W2012, 19XS133, 20W2012, 20XS133, 21W2012, 21XS133, 22W2012, 22XS133, 22XS133A, 23W2012, 23XS133, 23XS133A, 24W2012, 24XS133, and 24XS133A issued to the Diocese of Rochester.

<sup>2</sup> The term "Objections" refers to the Objections to the Sale Motion filed by the U.S. Trustee (the "UST") [Main Case Docket No. 3169] and The Continental Insurance Company ("CNA") [Main Case Docket No. 3171].

Debtor Reply”); the Committee [Main Case Docket No. 3200] (the “Committee Reply”); the Interstate Insurers [Main Case Docket No. 3201] (the “Interstate Reply”); and, the London Market Insurers [Main Case Docket No. 3199] (the “LMI Reply”) (collectively “Replies to Objections to of Sale Motion”).

### **CONCLUSION**

WHEREFORE, Underwriters respectfully request that the Court overrule the Objections and grant the Sale Motion.

Dated: June 13, 2025

Respectfully submitted,

By: /s/ Catalina J. Sugayan  
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